Message

From: Vazquez, Gil@Waterboards [Gil.Vazquez@waterboards.ca.gov]

Sent: 5/12/2016 8:36:33 PM

To: Mues, Pascal [Mues.Pascal@epa.gov]

Subject: FW: Revised Allocation of In-kind Service Contract Funding (per Kemmerer's Newly Reduced Reductions)

Attachments: FY16-17 Permit Reissuance Projections - 5-9-16.xlsx

Hello,

Per our conversation. I will talk later. I have to evacuate the building.

-Gil

From: Vazquez, Gil@Waterboards Sent: Monday, May 09, 2016 4:51 PM

To: Crader, Phillip@Waterboards; Messina, Diana@Waterboards (Diana.Messina@waterboards.ca.gov)

Cc: Isorena, Philip@Waterboards; Jauregui, Renan@Waterboards

Subject: RE: Revised Allocation of In-kind Service Contract Funding (per Kemmerer's Newly Reduced Reductions)

Hi Phil,

Please see the attached updated spreadsheet. Below are my explanations to address your two request and summarize the spreadsheet updates based on the 21 and 40 percent cuts:

Request 1:

Update analysis to reflect the lesser reduction proposed (21% cut) by John Kemmerer.

- 1. List of all permits scheduled to be issued in Fiscal Year (FY) 2016-2017. This list consists of contractor supported permits and permits without contract support. See spreadsheet tab "FY16-17 List with No Cuts."
- 2. List of Regional Water Board contract support requests for FY16-17. This list consists of all permits which will be retained for contract support and permits which will not be provided contract support due to the 21 percent cut. The permits being cut from contract support are highlighted in red. I based the cuts on expiration dates, ie, giving contract support first to permits with the oldest expiration dates. See Spreadsheet tab "FY16-17 Wishlist 21% Cut."
- 3. List of Regional Water Board contract support requests for FY16-17. This list consists of all permits which will be retained for contract support and permits which will not be provided contract support due to the 40 percent cut. The permits being cut from contract support are highlighted in red. I based the cuts on expiration dates, ie, giving contract support first to permits with the oldest expiration dates. See Spreadsheet tab "FY16-17 Wishlist 40% Cut."
- 4. Graphs and tables showing each Regional Water Board backlog without contractor support cut, 21 percent contract support cut, and 40 percent contractor support cut.
- 5. Graphs and tables containing a combination of all the Regional Water Board backlogs without contractor support cut, 21 percent contract support cut, and 40 percent contractor support cut. This information represents the effects of the contract support cut statewide.

The State tabs (State No Cuts, State 21% Cut, and State 40% Cut) contain the combined information from all the Regional Water Boards without contract support cut, 21 percent contract support cut, and 40 percent contractor support cut. These tabs show the effects of the cuts statewide over eight years. The first tab, "State No Cuts", shows the backlog reducing over the next three years which results in meeting US EPA's goal of 90 percent current. This tab also shows the State maintaining the permit status at 90 percent after three years.

The "State 21% Cut" tab shows the effects of the contract support cut of 21 percent. This tab shows the backlog increasing 3 percent in FY19-20. This is due to a large portion of the permits expiring during FY18-19. Similarly, the "State 40% Cut" tab shows the effects of the contract support cut of 40 percent with a backlog increasing of 5 percent in FY19-20. This is due to a large portion of the permits expiring during FY18-19. Overall, under both contractor support cut scenarios the graphs show that the backlog continues to increase statewide.

Request 2:

Update analysis to reflect the impact from staff reduction revised to reflect John Kemmerer's recent proposal.

The table below shows the 40 percent cut and 21 percent cut in the 106 allocation funds represents a cut of nine and six permits that would not be reissued due to staff cuts, respectively. On the other hand, the spreadsheet shows that a 40 percent cut in the contract support translates to 10 permits that would not be reissued in FY16-17. In addition, a 21 percent cut in the contract support translates to 2 permits that would not be reissued in FY16-17.

| FY15-16 Allocation (No Cuts) | | | | |
|--|---|--|---|--|
| Proposed FY16-17 Allocation 40% Cut Difference | | Proposed FY16-17 Allocation 21% Cut Difference | | |
| Cost of PY | | Cost of PY | | |
| 3 Permits/PY | | 3 Permits/PY | | |
| Cut as PY | 3 | Cut as PY | 2 | |
| Cut as Permits | 9 | Cut as Permits | 6 | |

Please let me know if you have any questions.

Sincerely,

-Gil Vazquez Water Resource Control Engineer

SWRCB – DWQ – NPDES Phone: 916.322.1400

Email: gvazquez@waterboards.ca.gov

From: Messina, Diana@Waterboards Sent: Wednesday, May 04, 2016 3:05 PM

To: Isorena, Philip@Waterboards; Vazquez, Gil@Waterboards

Cc: Crader, Phillip@Waterboards

Subject: FW: Revised Allocation of In-kind Service Contract Funding (per Kemmerer's Newly Reduced Reductions)

Importance: High

Hi Phil I. and Gil,

Will you please adjust the previous analysis you conducted for Phil Crader per the details in his email below, and John Kemmerer's email also below. I will be out of the office after today until the 15th. He needs it by Monday afternoon. Please send the adjusted analysis to Phil C. directly.

Thanks.

Diana

From: Crader, Phillip@Waterboards
Sent: Wednesday, May 04, 2016 2:59 PM

To: Messina, Diana@Waterboards

Subject: FW: Revised Allocation of In-kind Service Contract Funding

Hi Diana,

Our NPDES analysis needs to be updated to reflect 2 things. The lesser reduction proposed by John Kemmerer, and the impact from staff reduction revised to reflect John Kemmerer's recent proposal.

I'll reinforce that we are not actually proposing to reduce staff. This is just another way to look at the issue to inform the discussion. We recognize that the contractor does not take items to the Board or implement one, so reducing contractor resources and reducing staff resources by the same amount is not an apples to apples comparison. Can you have this to me by Monday afternoon?

Thanks, Phil

From: Kemmerer, John [mailto:KEMMERER.JOHN@EPA.GOV]

Sent: Tuesday, April 26, 2016 3:17 PM

To: Fredericksen, Shelly@Waterboards; Larsen, Karen@Waterboards; Crader, Phillip@Waterboards **Cc:** Messina, Diana@Waterboards; Borowiec, Elizabeth; Smith, Davidw@epamail.epa.gov; Whitson,

<u>Amelia@epamail.epa.gov</u>; Greenberg, Ken; Chew, Sandra; Morimoto, Kaoru

Subject: Revised Allocation of In-kind Service Contract Funding

Hi Shelly, Karen, and Phil - At our last bimonthly coordination meeting on March 18 we discussed the allocation of this year's California's 106 grant funds among in-kind service task orders. This is to update how we believe these funds should be allocated.

As you know, because more of this year's (federal fiscal year 2016) 106 grant is going to the SWRCB's PY costs, there is approximately 25% less available for in-kind service contracts as compared to last year (federal fiscal year 2015). During our March 18 meeting we discussed a proposed allocation that would have resulted in a very large (40%) cut to the in-kind service task order for NPDES Permit Development. We all recognized that this could have significant repercussions on permit issuance, but at the time it didn't appear that there were opportunities to make cuts to funding for other task orders. Since then, several of our folks have taken a closer look across all the in-kind service task orders, and we've come up with a revised allocation that spreads cuts across the ICIS-NPDES Data Entry, NPDES Permit Development and Pretreatment Support task orders.

The following table provides this Revised allocation, which we believe is a more reasonable way to allocate the available funds, while continuing to provide needed contract support for the State's Clean Water Act programs.

| | FFY-15 | FFY- 16 Proposed (discussed at 3/18/16 meeting) | FFY- 16 Revised |
|--------------------------|--------|---|-----------------|
| ICIS/NPDES Data Entry | | | |
| NPDES Permit Development | | | |
| MS4 inspection training | | | |
| TMDL Support | | | |
| Pretreatment Support | | | |
| Toxicity Policy Support | | | |

As we proceed to prepare documents to fund contract work with this year's funding, we'd like to utilize this revised allocation. Please let me know if you have any concerns with this approach.

Regards,

John

John Kemmerer, Associate Director Water Division U.S. EPA Region 9 600 Wilshire Boulevard, Suite 1460 Los Angeles, CA 90017 kemmerer.john@epa.gov 213-244-1832 (phone) 213-244-1850 (fax)